

Chart 1. Recommendation # 4 - Additions to Goals and Objectives of draft 2019 Helena Growth Policy Update.

As our letter (dated 8/18/2019) states, our comments suggest that the over-arching theme of the Growth Policy Update is to address climate change (planning, adaptation, mitigation, reversal). Our comments focus on water, greenhouse gas emissions, and waste and apply most directly to Public Facilities (Chapter 4), Transportation (Chapter 6), Environment (Chapter 7), and Water (Chapter 8). The basis of the majority of our comments and recommendations for goals and objective are from the City-adopted 2009 Climate Change Task Force Action Plan and City-adopted 2011 Growth Policy. We recognize that some of the objectives included are quite specific, and may be more specific than desired for this planning document and that some may need to be updated or refined. CBB offers to rework these recommendations if that would be helpful.

IMPLEMENTATION			
Develop Education and Outreach	all	IMP-4, pg 21. 2009 Climate Change Task Force Plan	
Data Collection & Reporting	Environment (7) Water (8)	IMP-5, pg 23. 2009 Climate Change Task Force Plan	
Funding and Leverage Resources	Public Facilities (4) Environment (7)	IMP-8. pg 28. 2009 Climate Change Task Force Action Plan	

GHG emissions – this encompasses the NRG Chapter goals	Public Facilities (4) Environment (7)	IMP-6. pg 25. 2009 Climate Change Task Force Action Plan	Updating beyond City Facilities goals and establishing community wide goals. CCB is in process of collecting data and setting targets. Set new target of X% below 2007 baseline based on 2017 data analysis and ICLEI recommended targets for City Properties for City Properties and the larger community by XX Date. Include interim milestones.
<p>ENERGY</p> <p>Goals: To do our share to hold global warming to well below 2° C; To accelerate the transition to a clean energy economy that will benefit Helena’s security, prosperity, and health: Identify quantifiable and measurable targets with incremental goals for greenhouse gas emission reductions and renewable energy conversion.</p>			
Lighting Upgrade at the Tenmile Water Treatment Facility	Public Facilities (4) Environment (7)	2009 Climate Change Task Force Action Plan. pg 29	All that have not been implemented – assign to Public Works and include in Public Facilities Section as objectives. Reference Chapter 3 of 2009 Report – Energy Efficiency Objectives.
Study/Install Water-source Heat Pump at the Tenmile Facility	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 32	
Study/Install Biomass Generator at the Tenmile Facility	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 33	
Efficiency Upgrades at the Tenmile Facility	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 35	

Zero Waste – Wastewater Treatment Target	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 39	
Develop a Comprehensive Energy Management Strategy	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 40	
Adopt Energy Efficiency Standards for City- Owned Buildings	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 41	
Improve Lighting Efficiency of City Buildings	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 44	
Reduce 'Plug Loads' in Buildings	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 46	
Work with the Utility (NWE) and Regulator (PSC) on Policies to Support Conservation and Renewable Energy	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 49	
Study/Develop Renewable Energy Project at City/County Facilities	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 51	

Adopt State Efficiency Standards and Improve Fleet Performance	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 54	
Study Biodiesel Use and Supply	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 56	
Convert Streetlights and Parking Lots to LED/Solar Technology	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. 57	installation pending
Employee Commute and Waste Reduction	Public Facilities (4) Environment (7) + others?	2009 Climate Change Task Force Action Plan. pg 61	
WATER			
1. Provide an adequate and stable supply of safe and economical water to the Helena community	Public Facilities (4) Environment (7) Water (8) + others?	2011 Helena Growth Policy – Water Goals	NOTE: Any not implemented assign to Water Dept and Public Works; Need to set targets and timeframes by _____ and establish process for accountability; HCCB will research and make recommendations per charter

2. Protect groundwater and surface water quality in the Helena area watershed for all users	Public Facilities (4) Environment (7) Water (8) + others?	2011 Helena Growth Policy – Water Goals	<p>OBJECTIVES OUTLINES IN 2011 GROWTH POLICY</p> <ol style="list-style-type: none"> 1. Maintain current sources of water and increase the City's access to new water resources to support current and projected growth and development. 2. Promote sustainable water availability for multiple uses of area waters, such as for recreational activities, forest health, wildlife preservation, and maintaining viable agricultural lands. 3. Encourage land-use change and development proposals that promote efficient use of City water infrastructure and resources. 4. Promote the efficient use and reuse of potable water. 5. Continue to invest in system upgrades and maintenance of the City's municipal water and wastewater network. 6. Coordinate the development of new, or expansion of existing, water and wastewater treatment capacity with Lewis and Clark County as necessary to meet the needs of a growing population. 7. Protect and maintain the Ten Mile watershed and water reservoirs. 8. Protect ground water and surface water quality in the Helena area watersheds. 9. Encourage in-fill and full utilization of properties currently served by, or in close proximity to, City water and wastewater infrastructure. 10. Review ways to reduce nutrient discharges from the wastewater treatment plant and the stormwater system, including enforcement of the Stormwater Ordinance and erosion control requirements. 11. Promote reducing impervious surfaces, thus increasing infiltration through the soil, which helps regenerate groundwater and remove pollutants. 12. Work with the County on joint development (City/County) standards that promote future connection to City services.

3. Reduce the per capita demand for water	Public Facilities (4) Environment (7) Water (8) + others?	2011 Helena Growth Policy – Water Goals	<p>13. Continue to authorize connection of County residents with failing septic systems or lagoons to City treatment facilities when compatible with this Growth Policy and the City discharge permit.</p> <p>14. Establish and maintain an inventory of sensitive areas such as water bodies, riparian areas, wetlands, and watersheds.</p> <p>15. Protect sensitive wildlife and aquatic habitat dependant on the area watershed and preserve critical ecological areas, such as wetlands, floodplains, and riparian corridors.</p> <p>16. Minimize the effect of development in areas with watercourses, drainage ways and wetlands and require mitigation of adverse impacts.</p> <p>17. Encourage the use of xeriscape landscaping, grey water, rain barrels, and other mechanisms to reduce demand on potable water and the amount of effluent.</p> <p>18. Establish nutrient reduction programs to reduce wastewater treatment requirements for City treatment facilities.</p> <p>19. Continue to promote water conservation techniques.</p> <p>20. Monitor the increase of invasive species and promote programs that reduce their spread in waterbodies.</p>

4. Reduce the water and wastewater treatment needs	Public Facilities (4) Environment (7) Water (8) + others?	2011 Helena Growth Policy – Water Goals	
Adopt Conservation Rates	Public Facilities (4) Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 65	Done. Recommend monitoring and refinement as necessary
Continue Upgrade of Supply and Treatment Facilities as Outlined in 2005 Water Facilities Plan	Public Facilities (4) Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 67	ongoing. update and refine as pertinent.
“Lush and Lean” Landscaping for Municipal Properties	Public Facilities (4) Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 69	Expand to City-wide. Continue to refine on municipal properties.

Study and Develop Community Water Conservation Incentives	Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 70	
Multi-faceted Water Conservation Education and Outreach Program on Water Conservation	Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 72	
Research and Adopt a Targeted Program to Regulate Water Use	Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 74	Goal: Reduce daily per capita water demand Target: 100 gpd
Pursue Water Supply/Municipal Watershed Protection	Environment (7) Water (8) + others?	2009 Climate Change Task Force Action Plan. pg 76	
ENVIRONMENT			

<p>1. Maintain and enhance a healthy, sustainable environment, reduce Helena's carbon footprint, respect significant natural features when development is permitted, and mitigate development's impacts with the City providing leadership in conservation and resource protection.</p>	<p>Environment (7) + others?</p>	<p>2011 Helena Growth Policy – Environment</p>	<p>2011 OBJECTIVES TO CARRY FORWARD</p> <ol style="list-style-type: none"> 1. Maintain and buffer irreplaceable natural features such as wetlands, stream corridors, and similar high-value habitats that provide wildlife habitat and recreational, water quality, and safety values, such as flood control. 2. Identify deer-resistant vegetation and drought-tolerant species and plant material that require minimal watering, incorporating a comprehensive public information program covering desirable landscape practices including green composting, xeriscaping, Integrated Pest Management (IPM) and adopt strategies for City activities that reflect best current practices in landscaping and pest management. 3. Require subdivisions to provide an efficient transportation system that accommodates future connectivity and non-motorized transportation to maintain air quality by reducing dust, auto emissions and greenhouse gases. 4. Evaluate subdivision impacts to ground and surface waters, water bodies, drainages, floodplains, riparian areas, and wetlands, incorporating adequate buffers or requiring appropriate mitigation, including, but not limited to, stormwater treatment and discharges to improve the viability of wetlands
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	Environment (7) + others?	2011 Helena Growth Policy – Environment	OBJECTIVES TO CARRY FORWARD - CONT'D. <ol style="list-style-type: none"> 1. Reduce demand on the water supply system and the gallons per capita per day demand, thereby reducing the need for infrastructure expansion by adopting a targeted multi-faceted community education and outreach water conservation program that may include incentives. 2. Pursue water supply/municipal watershed protection, especially the Ten Mile watershed as a key part of the municipal water supply and restore those parts of the watershed that have been impaired by human activity. 3. Minimize environmental degradation in areas with challenging physical and environmental characteristics, such as steep slopes, wildland-urban interface, watercourses, drainage ways and wetlands, and minimize cut-and-fills on slopes resulting from road or building construction. 4. Prevent loss of life, property, and increased costs to the public from a Wildland-Urban Interface fire on public and private land located in and around Helena and maintain an effective emergency response and recovery system that ensures safe and orderly evacuation. 5. Promote energy efficiency and conservation with development standards, land use regulations, public/private partnerships and education, and consider the use of incentives where appropriate.
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	Environment (7) + others?	2011 Helena Growth Policy – Environment	OBJECTIVES TO CARRY FORWARD – CONT'D. <ol style="list-style-type: none"> 1. Establish a municipal greenhouse gas reduction goal and implement the recommendations of the 2009 Climate Change Action Plan 2. Eliminate financial disparities by providing recycling services to City residents and other participants in accordance with their financial support.

<p>-Promote and incentivize green building infrastructure, energy conservation, recycling, renewable energy (solar/geothermal), zero-waste, etc. Also, consider disincentives such as fees and pollution pricing.</p> <p>-Institute programs and projects to address sustainability and climate change such as source reduction, recycling and reuse of materials to achieve zero waste, etc.</p> <p>-Track available strategic indicators including, but not limited to, the following: temperature, precipitation, snowfall, days below freezing, and incorporation of photovoltaics into public and private infrastructure.</p> <p>-Educate the public on best practices to promote community gardens, locally produced foods, healthy food preparation, and ecologically sound gardening practices that reduce water, synthetic fertilizer, and pesticide use.</p>	<p>Environment (7) + others?</p>	<p>2011 Helena Growth Policy – Environment</p>	
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ENVIRONMENT			
1. Protect public health and ensure public safety	Public Facilities (4) Environment (7) + others?	2011 Helena Growth Policy – Public Facilities	2011 Objectives to carry forward: <ul style="list-style-type: none"> <input type="checkbox"/> Make public health and public safety high priorities and address potential hazards for areas located adjacent to and within the City. <input type="checkbox"/> Encourage infill development on vacant and underutilized land and full utilization of properties currently served by, or in close proximity to, infrastructure with a scale and quality that is compatible with the surrounding neighborhood. <input type="checkbox"/> Apply development requirements equally to public agencies and private entities. <input type="checkbox"/> Create a public-works funding system <input type="checkbox"/> that will divide the cost of providing infrastructure and protecting the environment between the public and those developing land. <input type="checkbox"/> Implement the Parks, Recreation and Open Space Plan. <input type="checkbox"/> Continue to provide a safe community for citizens and visitors through education and mitigation for adequate response to, and recovery from, disasters and emergencies. <input type="checkbox"/> Support joint planning efforts to provide <input type="checkbox"/> coordinated infrastructure in the future. <input type="checkbox"/> Increase and support recycling for Helena residents
2. Protect and enhance the natural environment; promote efficient use of community infrastructure, services, and transportation networks; and conserve resources	Public Facilities (4) Environment (7) + others?	2011 Helena Growth Policy – Public Facilities	

<p>3. Promote conservation, workplace safety and other community values by investing in buildings, vehicles and programs encompassed in facilities and services that support green building design, workplace ergonomics and energy efficiency</p>	<p>Public Facilities (4) Environment (7) + others?</p>	<p>2011 Helena Growth Policy – Public Facilities</p>	

<p>4. Promote municipal, commercial and private recycling and composting and significantly reduce the amount of waste going into the municipal landfill</p>	<p>Public Facilities (4) + others?</p>	<p>includes NEW PROPOSED GOAL of “zero waste plan”</p>	<p>NEW PROPOSED OBJECTIVES</p> <ul style="list-style-type: none"> <input type="checkbox"/> Support the exploration and possible creation of a Zero Waste Plan to establish clearly defined waste reduction goals through Reduction, ReUse, Recycling, and Composting. <input type="checkbox"/> Develop an integrated solid waste management plan which establishes priorities for waste management, and sets a solid waste reduction target. These approaches, in order of priority, are: <ol style="list-style-type: none"> 1. Source Reduction (also Waste Reduction): Preventing waste in the first place. 2. Reuse: Giving a second life to a used product or material. 3. Recycling: Introducing one or more waste materials or products into a manufacturing process to produce a new product. 4. Composting: The controlled decomposition of organic materials by microorganisms. 5. Landfill and Incineration